

Exhibit A

Michael Liskow

From: Douglas J. McNamara <DMcNamara@cohenmilstein.com>
Sent: Wednesday, July 6, 2022 5:25 PM
To: Havlin, Kim; Merryman, Bryan; Mims, Kathryn; Godar, Katherine
Cc: Steven J. Toll; Rosemary Rivas; Janine Pollack; Michael Liskow; Mark Troutman; Geoffrey Gruber
Subject: Gerber Baby Food - Custodians and Initial ESI terms
Attachments: Gerber - Plaintiff proposed search terms(3739073.1).xlsx

Dear Counsel:

Thank you for answering our questions today regarding the proposed ESI custodians. We agree on your selection for prioritization.

- Cheryl Callen
- Paula Casey
- Wendy Johnson
- Mohini Joshi
- Basharat Khalil
- Susan Pac
- Lyle Pater

Also attached are some search terms based on publicly available documents and the complaint. Plaintiffs do not know how the products, testing, ingredients, and heavy metals are discussed internally at Gerber (Such as nicknames, chemical symbols, codes, etc.). **We are reliant on Gerber to provide those in making this initial search sensible, as opposed to Plaintiffs learning those terms after the production of documents or deposition of witnesses.** Based upon the search terms used by the AGs and the House, and Gerber's identification of custodians, Gerber must have some ideas as to search terms likely to turn up responsive documents to our request. Please get back to us on July 11th with search terms so that a hit report may be run by July 13th. Thank you for your cooperation.

Douglas J. McNamara
Partner

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